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*Attorneys for Defendant Bed Bath & Beyond, Inc.
with respect to the Feit Electric accused products.*

**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

SEOUL SEMICONDUCTOR CO., LTD.
and SEOUL VIOSYS CO., LTD..

Plaintiff,

V.

BED BATH & BEYOND, INC.,

Defendant.

Case No. 2:18-CV-03837-PSG-SKx

**DECLARATION OF PAUL A.
KROEGER IN SUPPORT OF
DEFENDANT BED BATH & BEYOND,
INC.'S NOTICE OF MOTION AND
MOTION FOR PARTIAL SUMMARY
JUDGMENT OF NON-
INFRINGEMENT AND INVALIDITY**

Judge: Hon. Philip S. Gutierrez

Date: May 26, 2020

Time: 9:00 a.m.

Ctrm: 6A

1 I, Paul A. Kroeger, declare as follows:

2 1. I am an attorney at the law firm of Russ August & Kabat, counsel for
3 Defendant Bed Bath & Beyond Inc. ("BB&B" or "Defendant") in this action, and a
4 member in good standing of the bar of California and of this Court. I make all statements
5 herein based on my personal knowledge.

6 2. Attached hereto as Exhibit 1 is a true and correct copy of Plaintiffs' A mended
7 Preliminary Infringement Contentions served in this action on or around March 6, 2019.

8 3. Attached hereto as Exhibit 2 is a true and correct copy of U.S. Patent No.
9 6,942,731

10 4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts of the
11 Expert Report of Siddha Pumputkar, Ph.D. dated December 23, 2019, and which was
12 served on us by counsel for Plaintiffs on or around the same date.

13 5. In discovery in this action, third-party Feit produced documents and
14 information concerning the manufacturers of the LEDs utilized by the accused products.
15 Plaintiffs elected not to take any discovery concerning those products in this action.

16 6. Attached hereto as Exhibit 4 are true and correct copies of excerpts of the
17 transcript of the deposition of Siddha Pimputkar, dated February 29, 2020.

18 7. Attached hereto as Exhibit 5 are true and correct copies of excerpts of a
19 document produced by counsel for Plaintiffs in this matter commencing with the bates-
20 number SSC-BBB00006842.

21 8. Attached hereto as Exhibit 6 are true and correct copies of excerpts of a
22 document produced by counsel for Plaintiffs in this matter commencing with the bates-
23 number SSC-BBB00006479.

24 9. Attached hereto as Exhibit 7 are true and correct copies of excerpts of a
25 document produced by counsel for Plaintiffs in this matter commencing with the bates-
26 number SSC-BBB00006790.

1 10. Attached hereto as Exhibit 8 are true and correct copies of excerpts of a
2 document produced by counsel for Plaintiffs in this matter commencing with the bates-
3 number SSC-BBB00006341.

4 11. Attached hereto as Exhibit 9 are true and correct copies of excerpts of a
5 document produced by counsel for Plaintiffs in this matter commencing with the bates-
6 number SSC-BBB00005718.

7 12. Attached hereto as Exhibit 10 are true and correct copies of excerpts of the
8 Expert Report of Dr. Ian Ferguson Regarding Non-Infringement of the Asserted Claims of
9 U.S. Patent No. 6,942,731.

10 13. Attached hereto as Exhibit 11 is a true and correct copy of U.S. Patent No.
11 8,168,988.

12 14. Attached hereto as Exhibit 12 is a true and correct copy of U.S. Patent No.
13 8,829,552.

14 15. Attached hereto as Exhibit 13 is a true and correct copy of excerpts of the
15 Expert Report of William Alan Doolittle Ph.D. dated December 23, 2019, and which was
16 served on us by counsel for Plaintiffs on or around the same date.

17 16. Attached hereto as Exhibit 14 are true and correct copies of excerpts of the
18 transcript of the deposition of William Alan Doolittle, Ph.D., dated February 26, 2020.

19 17. Attached hereto as Exhibit 15 is a true and correct copy of U.S. Patent No.
20 7,982,207.

21 18. Attached hereto as Exhibit 16 is a true and correct copy of a Memorandum
22 Opinion & Order dated September 30, 208, in the action *Seoul Viosys v. P3 International*
23 *Corporation*, United States District Court for the Southern District of New York, Case No.
24 16-CV-6276 (AJN). This Order was produced in this action by counsel for Plaintiffs
25 starting with the bates-number SSC_BBB-000007772.

19. Attached hereto as Exhibit 17 is a true and correct of the Judgement entered in the *Seoul Visosys v. P3 International Corporation* matter dated August 21, 2019. I obtained this document personally from Pacer.

20. Attached hereto as Exhibit 18, are Plaintiffs Disclosure of Asserted Claims and Infringement Contentions in the *Seoul Visosys v. P3 International Corporation*. This document was submitted as an exhibit as part of the Defendant's motion for summary judgment that lead to the Order attached as Exhibit 16. I personally obtained this document from Pacer.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 27, 2020 at Los Angeles, California.

/s/ Paul A. Kroeger

Paul A. Kroeger